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HON KEUNG SO

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HON KEUNG SO,  
  
Defendant.

Case No.: CR 14-00196-CRB

**DEFENDANT HON KEUNG SO'S JOINDER IN  
CODEFENDANTS MOTIONS TO SEVER**

Date: November 12, 2014  
Time: 10:00 A.M.  
Court: The Honorable Charles R. Breyer

Defendant Hon Keung So ("Mr. So"), through counsel, hereby joins in defendant Rinn Roeun's "MOTION TO SEVER CO-DEFENDANTS PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 8(b)" filed on October 3, 2014 at docket number 514; defendant Xiao Cheng Mei's "MOTION TO SEVER CO-DEFENDANTS PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 8(b)" filed on October 3, 2014 at docket number 518; defendant Barry Blackwell House's "MOTION TO SEVER CODEFENDANTS UNDER FEDERAL RULE OF CRIMINAL PROCEDURE 8(b)" filed on October 3, 2014 at docket number 519; defendant Leland Yee's "MOTION TO SEVER DEFENDANT" filed on October 3, 2014 at docket number 520; defendant Keith Jackson's "JOINDER IN MOTION TO SEVER FILED BY DEFENDANT LELAND YEE" filed on October 3, 2014 at docket number 522; defendant Andy Li's "MOTION TO SEVER DEFENDANT"

1 filed on October 3, 2014, at docket number 526; defendant Albert Nhingsavath's "MOTION FOR  
 2 JOINDER RE: MOTION TO SEVER DEFENDANT" filed on October 6, 2014, at docket number 534,  
 3 and defendant Anthony Lai's "JOINDER IN CODEFENDANTS MOTION TO SEVER" filed on  
 4 November 7, 2014 at docket number 582. The arguments presented and the authorities cited in the  
 5 Motions are equally applicably to Mr. So, and through this joinder Mr. So incorporates the filed points  
 6 and authorities as though here set out fully and at length.

7 Mr. So moves for a separate trial on the ground that he has been improperly joined in the  
 8 Superseding Indictment, which joins co-defendants alleged to be involved in two separate and distinct  
 9 RICO Conspiracies (Counts #1 and #2). Mr. So has not been charged in Count #1 ("CKT Conspiracy")  
 10 or in Count #2 ("Campaign Conspiracy"). Out of the 228 Counts in the Superseding Indictment, Mr. So  
 11 has only been charged in Count #99, an alleged violation of 18 U.S.C. §§ 371 and 2315 – Conspiracy to  
 12 Receive and Transport Stolen Property in Interstate Commerce. Mr. So has been charged in this Count  
 13 along with co-defendants Kwok Cheung Chow, George Nieh, and Ming Ma, all of whom are charged in  
 14 Count #1, the CKT Conspiracy.

15 Nowhere in the Superseding Indictment has it been alleged that Mr. So was a member of either  
 16 the CKT Conspiracy or the Campaign Conspiracy. Mr. So's only alleged connection to the CKT  
 17 Conspiracy is that his alleged offense is enumerated as evidence of a pattern of racketeering activity of  
 18 the CKT enterprise. As such, severance from all other co-defendants charged in the CKT and Campaign  
 19 Conspiracies, as well as severance from all other co-defendants not charged along with Mr. So in Count  
 20 #99, is warranted.

21 DATED: November 7, 2014

Respectfully submitted,

22  
 23 /s/  
 EDWIN PRATHER  
 MAX MIZONO  
 Attorneys for Defendant  
 HON KEUNG SO